

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

ABDUR RAHIM ISLAM
SHAHIED DAWAN
KENYATTA JOHNSON
DAWN CHAVOUS

No. 2:20-CR-00045-GAM

Honorable: Gerald Austin McHugh

PROPOSED ORDER

AND NOW, this _____ day of _____, 2022, upon consideration of Defendant Dawn Chavous' Motion to Seal her Response in Opposition to the Government's Motion to Unseal, it is **ORDERED** that Ms. Chavous' Motion is **GRANTED**. Ms. Chavous' Response in Opposition to the Motion to Unseal **SHALL BE FILED UNDER SEAL**.

BY THE COURT:

HON. GERALD AUSTIN MCHUGH
United States District Judge

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ABDUR RAHIM ISLAM
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**DEFENDANT DAWN CHAVOUS' MOTION TO SEAL HER RESPONSE IN
OPPOSITION TO THE GOVERNMENT'S MOTION TO UNSEAL**

Defendant Dawn Chavous ("Ms. Chavous"), by and through undersigned counsel, hereby moves to seal the concurrently submitted Response in Opposition to the Government's Motion to Unseal (the "Opposition"), attached hereto as Attachment 1.¹ In support thereof, Ms. Chavous avers as follows:

1. On January 28, 2020, a federal grand jury returned a 22-count Indictment against Defendants Abdur Rahim Islam, Shahied Dawan, Kenyatta Johnson, and Dawn Chavous. Councilmember Johnson and Ms. Chavous were charged in only two of those counts: Honest Services Wire Fraud in violation of 18 U.S.C. §§ 1343 and 1346. ECF No. 1.

2. Trial is scheduled to commence on March 21, 2022 on Counts 9 and 10. ECF No. 111.

3. On January 4, 2022, Ms. Chavous filed three motions *in limine* (ECF Nos. 120, 121, 122) that were sealed by Court Order (ECF Nos. 133, 134, 135).

¹ An unredacted version of Attachment 1 has been submitted to the Court via electronic mail.

4. On January 12, 2022, the Government moved to unseal those motions, but neglected to file that motion—which detailed the contents of the sealed filings—under seal *See* ECF 151.

5. The next day, upon the request of Counsel, the Motion to Unseal was sealed by Court Order, which was provided to the parties via electronic mail. *See id.*

6. Because the Government’s Motion was sealed pursuant to that Order, and given that the Government’s Motion references information already sealed by this Court, good cause exists to seal Ms. Chavous’ Opposition, which likewise references sealed information.

7. Accordingly, Ms. Chavous respectfully requests that the Court issue an order directing that the Opposition be filed under seal.

Respectfully submitted,

Dated: January 20, 2022

/s/ Barry Gross

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Attorneys for Defendant Dawn Chavous

CERTIFICATE OF SERVICE

I, Barry Gross, hereby certify that on this day I caused a true and correct copy of the foregoing were filed electronically with the Case Management/Electronic Case Filing System (“CM/ECF”) for the Federal Judiciary. Notice of this filing will be sent to all parties by operation of the Notice of Electronic Filing system, and the parties to this action may access this filing through CM/ECF.

Dated: January 20, 2022

/s/ Barry Gross

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